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November 1, 2024

BY ECF:

Honorable Allyne R. Ross  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Defense respectfully request for a temporary modification of Mr. Lai's release conditions travel outside of New York State and New Jersey from November 8, 2024, and November 11, 2024 is granted. So Ordered,

 /s/(ARR) 

Allyne R. Ross, U.S.D.J. 11/2/2024

RE: United States v. Zhibin Lai  
Case No.: 23-cr-00246- 1 (ARR)  
Third Letter Motion Seeking Temporary Modification of Release  
Conditions

Dear Judge Ross:

Please be advised that I represent **Zhibin Lai** in the above captioned action.

Mr. Lai is currently subject to release conditions as per Your Honor's June 27, 2023 (ECF No.: 8) Order, Mr. Lai cannot leave New York State and New Jersey except for travel to and from court.

We respectfully submit this letter requesting a temporary modification of Mr. Lai's release conditions.

Mr. Lai seeks permission from the court to travel outside of New York State and New Jersey to travel with his family to Stroudsburg, PA, from November 8, 2024, and November 11, 2024. He will be staying at an Airbnb in Stroudsburg.

All other restrictions on Mr. Lai will remain in place throughout the duration of this trip, and the requested modification will terminate upon his return on November 11, 2024.

Neither Pretrial Services nor the Government has any objection to the requested modification.

Thank you in advance for your attention to this matter.

Honorable Allyne R. Ross  
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Sincerely,  
**Spodek Law Group P.C.**  
/s/ Todd A.Spodek  
Todd A. Spodek

cc: All Counsel of Record (By ECF).  
PSO Robert Stehle (By Email).